



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/JEA/PAS
F. #2020R00508

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 9, 2020

By ECF

Honorable Dora L. Irizarry
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Samantha Shader
Criminal Docket No. 20-202 (DLI)

Dear Judge Irizarry:

Pursuant to the Court's August 27, 2020 scheduling order, the parties are providing a status report to the Court in advance of the status conference scheduled for September 16, 2020 at 12:00 p.m.

The defendant Samantha Shader is charged in a seven-count indictment with use of explosives, in violation of 18 U.S.C. § 844(f)(1), arson, in violation of 18 U.S.C. § 844(i), using an explosive to commit a felony, in violation of 18 U.S.C. § 844(h)(1), arson conspiracy, in violation of 18 U.S.C. § 844(n), use of a destructive device, in violation of 18 U.S.C. § 924(c)(1)(B)(ii), civil disorder, in violation of 18 U.S.C. § 231(a)(3) and possessing and making a destructive device, in violation of 26 U.S.C. §§ 5861(d) and 5861(f).

On July 17, 2020, the Court held a status conference and the defendant was arraigned on the pending indictment. That same day, the Court issued a written order granting in part and denying in part the defendant's motion to inspect grand jury records. On July 23, 2020 and July 28, 2020, the Clerk of the Court provided the grand jury records to the defendant and the government. On July 24, 2020, the government provided the defendant with its second Rule 16 discovery production. On August 27, 2020, the government provided the defendant with its third Rule 16 discovery production.

The government has now produced all the Rule 16 discovery in its possession. However, the investigation is ongoing and the government has not yet determined whether it will supersede the pending indictment, but anticipates notifying the Court by the time of the

next status conference. In light of the voluminous discovery provided to the defendant, the parties request an additional status conference in 60 days.

Finally, the parties request that the Court exclude time under the Speedy Trial Act. Specifically, the parties request that the Court find that the ends of justice are served by ordering the requested continuance as this continuance outweighs the best interests of the public and the defendant's right to a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A). In particular, the need for the defendant to review the voluminous discovery provided to date.

Respectfully submitted,

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Cc: Clerk of the Court (DLI) (by ECF)
Amanda David, Esq. and Samuel Jacobson, Esq. (by ECF and E-mail)